

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

D.V.D.; M.M.; E.F.D.; and O.C.G.,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND SECURITY;
Kristi NOEM, Secretary, U.S. Department of
Homeland Security, in her official capacity; Pamela
BONDI, U.S. Attorney General, in her official
capacity; and Antone MONIZ, Superintendent,
Plymouth County Correctional Facility, in his official
capacity,

Defendants.

Case No. 25-cv-10676-BEM

**PLAINTIFFS' SUBMISSION OF ADDITIONAL EXHIBIT IN SUPPORT OF THEIR
MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs respectfully submit the attached declaration from Laura Belous, an attorney documenting the removal of a former client of her office in apparent violation of this Court's Temporary Restraining Order. ECF 34. The declaration is attached as Exhibit A. Plaintiffs received the declaration from Ms. Belous this evening at 8:12 p.m. ET and are filing it with the Court as expeditiously as possible under the circumstances, as additional support for their Motion for a Preliminary Injunction. ECF 57.

Respectfully submitted,

s/Trina Realmuto

Trina Realmuto*

Kristin Macleod-Ball*

Mary Kenney*

Tomás Arango

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

s/ Trina Realmuto
Trina Realmuto
National Immigration Litigation Alliance

Dated: April 9, 2025